

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

BRENT NIX, individually and on behalf)
of all others similarly situated,)

Plaintiff,)

v.)

THE CHEMOURS COMPANY FC, LLC,)
THE CHEMOURS COMPANY, E.I.)
DUPONT de NEMOURS AND)
COMPANY, INC., E.I. DUPONT)
CHEMICAL CORPORATION, ELLIS H.)
MCGAUGHY, and MICHAEL E.)
JOHNSON,)

Defendants.)

Case No.: 7:17-CV-00189-D

ROGER MORTON, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

THE CHEMOURS COMPANY FC, LLC,)
THE CHEMOURS COMPANY, E.I.)
DUPONT de NEMOURS AND)
COMPANY, INC., E.I. DUPONT)
CHEMICAL CORPORATION, ELLIS H.)
MCGAUGHY, and MICHAEL E.)
JOHNSON,)

Defendants.)

Case No.: 7:17-CV-00197-D

Caption continues on next page

**NOTICE OF MOTION AND MOTION OF VICTORIA CAREY TO APPOINT THE
LAW FIRMS OF COHEN MILSTEIN SELLERS & TOLL PLLC AND SUSMAN
GODFREY LLP AS INTERIM CO-LEAD CLASS COUNSEL**

VICTORIA CAREY, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

v.)

E. I. DU PONT DE NEMOURS AND)
COMPANY and THE CHEMOURS)
COMPANY FC, LLC,)

Defendants.)
_____)

Case No.: 7:17-CV-00201-D

PLEASE TAKE NOTICE that Plaintiff Victoria Carey hereby moves for the appointment, pursuant to Fed. R. Civ. P. 23(g), of the law firms of Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein”) and Susman Godfrey LLP (“Susman Godfrey,” and together with Cohen Milstein, the “*Carey* Counsel”) as interim co-lead counsel for the classes in the above-captioned actions. Given each of the factors set forth in Fed. R. Civ. P. 23(g), namely “1) the work counsel has done in identifying or investigating potential claims in the action; 2) counsel’s experience in handling class actions, other complex litigation, and the types of claims asserted in the action; 3) counsel’s knowledge of the applicable law; and 4) the resources that counsel will commit to representing the class,” Fed. R. Civ. P. 23(g)(1)(A), the *Carey* Counsel are the most qualified counsel for appointment, and, indeed, have already demonstrated their leadership of this litigation, as set forth in the memorandum in support of Ms. Carey’s motion, filed contemporaneously herewith together with its exhibits.

Dated: October 27, 2017

Respectfully submitted,

/s/ Theodore J. Leopold
Theodore J. Leopold
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/s/ Martha Geer

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Attorneys for Plaintiff Victoria Carey

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2017, I electronically filed the *NOTICE OF MOTION AND MOTION OF VICTORIA CAREY TO APPOINT THE LAW FIRMS OF COHEN MILSTEIN SELLERS & TOLL PLLC AND SUSMAN GODFREY LLP AS INTERIM CO-LEAD CLASS COUNSEL* with the Clerk of the Court using the ECF who in turn served it on all counsel or parties of record on the Service List below, and served the forgoing *NOTICE* on the following Defendants by placing a copy of the same in the United States Mail, first class postage prepaid, addressed as follows:

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Dated: October 27, 2017

/s/ Martha Geer

Martha Geer

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